pany's disobedience of the statute was the proximate cause of the fire spreading to the plaintiff's house. It would also seem that the railroad company would have been liable, in the absence of a statute fixing a limit to the time that railroad companies are permitted to obstruct a public highway, since the right of the public to the use of a highway as a highway is superior to that of a railroad company to make use of it for its own private business. It is true that the grant of a right to cross a public highway, to a railway company, necessarily implies that the highway will be obstructed at times by the passage of the company's trains across it, but there is certainly no implication of a right to stop the trains across a highway for any considerable length of time.—National Corporation Reporter.

Homicide by Drunkard—Murder—Manslaughter.—The King *v.* Meade (1909) 1 K. B. 895, was an appeal from a conviction for murder. The prisoner was indicted for murder of a woman, and it appeared that the deceased died from injuries inflicted on her by the prisoner while in a state of drunkenness. Coleridge, J., who tried the prisoner directed the jury: "That everyone is presumed to know the consequences of his acts. If he be insane that knowledge is not presumed. Insanity is not pleaded here, but where it is part of the essence of a crime that a motive, a particular motive shall exist in the mind of the man who does the act, the law declares this—that if the mind at that time is so obscured by drink, if the reason is dethroned and the man is incapable therefore of forming that intent, it justifies the reduction of the charge from murder to manslaughter." The prisoner objected to this charge on the ground that it might mislead the jury into thinking they could not acquit the prisoner unless they found him to have been insane; and that it ought to have been left to the jury to say whether the prisoner in fact had no intention of doing grievous bodily harm. The Court of Criminal Appeal (Darling, Walton and Pickford, JJ.) thought that the rule in such cases is this —that the presumption that everyone intends the natural consequences of his acts may be rebutted by showing the mind of the accused to have been so affected by drink that he was incapable of knowing that what he was doing was dangerous, i. e., likely to inflict serious injury—and that the charge of Coleridge, J., was substantially in accordance with that rule. The appeal was therefore dismissed.—Canada Law Journal.

Skidding Motor Bus—Liability to Passenger.—The case of Wing *v.* London General Omnibus Co., Limited (100 L. T. Rep. 301), which had reference to the skidding of a motor omnibus, is of undoubted importance so far as passengers in such a vehicle are concerned. It was laid down in Redhead *v.* Midland Railway Company (16 L. T. Rep. 485) that it was the duty of a carrier of passengers to take